

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RACHELLE JACKSON,)	
)	
Plaintiff,)	
)	
v.)	No. 03 C 8289
)	
CITY OF CHICAGO, and POLICE OFFICERS)	Judge Ruben Castillo
PATRICK MCCORMACK, Star 60045,)	
MICHEAL O'DONNELL, Star 60029,)	
KELLY BROGAN, Star 10051, R. VAHL,)	
Star 7350 and S. BARSCH,)	
)	
Defendants.)	

PROPOSED MODIFIED PRE-TRIAL ORDER

This matter having come before the Court at a pretrial conference held under Fed.

R. Civ. P. (Rule) 16, and

Daniel S. Alexander
Law Offices of Daniel S. Alexander
820 W. Jackson Boulevard, Suite 300
Chicago, Illinois 60607

Christopher R. Smith
A Law Office of Christopher R. Smith
119 North Peoria Street, Suite 3A
Chicago, Illinois 60607
209 South LaSalle Street
Seventh Floor
Chicago, IL 60604

having appeared as counsel for Plaintiff Rachelle Jackson and

Andrew M. Hale
Avi T. Kamionski
Andrew M. Hale & Associates
53 West Jackson
Suite 1757
Chicago, Illinois 60604
312-341-9646

having appeared as counsel for Defendants Patrick McCormack, Robert Vahl, Steven Barsch, Michael O'Donnell Kelly Brogan, and City of Chicago. the following actions were taken:

1. Nature of Case:

This is a civil rights action under 42 U.S.C. § 1983 and the jurisdiction of the court is invoked under 28 U.S.C. § 1367 and 28 U.S.C. § 1391(c). The jurisdiction of the court over plaintiff's supplemental state law claims is invoked pursuant to 28 U.S.C. § 1367. Jurisdiction is not disputed.

2. The following stipulations and statements were submitted and are attached to and made a part of this Order:

- (a) a comprehensive stipulation or statement of all uncontested facts, which will become a part of the evidentiary record in the case: n/a**
- (b) Agreed Statement of the Case: n/a**
- (c) Schedule of Exhibits**
 - C(i) – Plaintiff's Exhibit List**
 - C(ii) – Defendants' Exhibit List**
 - C(iii) – Plaintiff's Objections To Defendants' Exhibit List**
 - C(iv) – Defendants' Objections To Plaintiff's Exhibit List**
- (d) Witnesses³**
 - D(i) – Plaintiff's Witness List**
 - D(ii) – Defendants' Witness List**
 - D(iii) – Plaintiff's Objections To Defendants' Witness List**
 - D(iv) – Defendants' Objections To Plaintiff's Witness List**
- (f) Depositions: n/a**
- (g) Itemized Statement of Damages: n/a**
- (h)(i) Trial Briefs: n/a**
- (h)(ii) Jury Instructions: n/a**

³ The parties further reserve the right to call any witness listed on either side's witness list, including those for whom their objections (if any) are overruled.

(h)(iii) List of Questions the Party requests the court to ask prospective jurors in accordance with Fed. R. Civ. P. 47(a): n/a

(i) Discovery: n/a

- 3. The trial of this case is expected to take six (6) days.**
- 4. This will be a Jury Trial.**
- 5. The parties recommend that 8 jurors be selected at the commencement of the trial.**
- 6. The parties do not agree that the issues of liability and damages should be bifurcated for trial.**
- 7. The parties do not consent to reassignment of this case to a magistrate judge for trial.**
- 8. This order will control the course of the trial and may not be amended except by consent of the parties and the court, or by order of the court to prevent manifest injustice.**
- 9. Possibility of settlement of this case was considered by the parties.**

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Star 7350 and S. BARSCH,)	
)	
Defendants.)	

SCHEDULE C(i) – EXHIBIT LISTS

PLAINTIFF'S EXHIBIT LIST¹

1. Pharmacy Tech License
2. Brogan and Juana Herrera cellular telephone records
3. Brogan Cook County hospital Medical Records
4. Employee Earnings and Social Security Records of Rachelle Jackson
5. Traffic Specialist Hayes Report, including interview of Defendant Brogan
6. 911 Tapes, Disk, and Transcripts (PCADØS)
7. Arrest Reports of Rachelle Jackson
8. Vice Case Reports of Rachelle Jackson
9. EMT Reports-Fire Department óPre-Hospital Care Report 1-3
10. Quest Lab Reports, Rachelle Jackson order by Dr. Dragon Djordjevic
11. Scene Photos
12. Booking Photo of Rachelle Jackson
13. Accident Statements
14. Line-Up Photos
15. Neurological Case Associates Medical Records
16. Criminal History Report Rachelle Jackson
17. Accident Scene Diagram

¹ Plaintiff reserves the right to introduce into evidence any of the exhibits listed by the other side for which their objections are overruled or withdrawn.

Impeachment Only

18. Witness Statements
19. Deposition Transcripts
20. Expert Reports
21. Grand Jury Transcripts
22. Criminal Trial Transcripts and Motion to Suppress Transcripts
23. All Detective Reports, Supplemental Reports, and GPRs
24. Brogan Physical Therapy Reports
25. OPS Reports

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Star 7350 and S. BARSCH,)	
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Defendants.)	

SCHEDULE C(ii) – EXHIBIT LISTS

DEFENDANTS' EXHIBIT LIST²

1. Lineup Mugs Shots ó RJ00209-RJ00210
2. Picture of Pierre Mangun P361
3. Byron Mangun Mug Shot Photo RJ00613
4. Pierre Mangun Mug Shot Photo RJ00614
5. Rachelle Jackson Mug Shot Photo RJ00619
6. Photos ó RDHH790201 RJ00871-RJ00884
7. Photos ó RDHH790104 RJ01236-RJ01272
8. Polaroid Photo (front and back) of Rachelle Jackson and ASA Brassil RJ00887-RJ00888
9. Polaroid Photo (front and back) of Rachelle Jackson and ASA Brassil RJ00889-RJ00890
10. Polaroid Photo (front and back) of Eric Clifton and ASA Brassil RJ00891-RJ00892
11. Polaroid Photo (front and back) of Eric Clifton and ASA Brassil RJ00893-RJ00894
12. Polaroid Photos from ASA Brassil RJ00895-RJ00902

² Defendants reserve the right to use/introduce any exhibit listed by Plaintiff. ¹ Defendants have numbered all potential exhibits. Although numbered on this list, defendants reserve the right to object to introduction of any of these exhibits, some of which may be subject to motions in limine. In addition, defendants would object to placing any document, not entered by the Court, on an overhead projector or to be shown to the Jury.

13. Missing Person Case Supp Report RJ01060-RJ010665
14. Statement of Rachelle Jackson to ASA Brassil RJ00266-RJ00271
15. Statement of Eric Clifton to ASA Brassil RJ00272-RJ00277
16. Rachelle Jackson's CC Jail booking photo RJ00935 (P362)
17. Rachelle Jackson's oral statement to ASA Brassil RJ00936

Marked for Identification

18. OEMC Event Query and PDT Printouts RJ00009-RJ000105
19. Investigative File Inventory RJ00107-RJ00109
20. Traffic Citations issued to Denard Stewart RJ00110-RJ00113
21. Driver Crash Statement of Denard Stewart RJ543 and P355-356
22. Pierre Mangun's first oral statement to ASA Brassil RJ00932
23. Pierre Mangun's second oral statement to ASA Brassil RJ00933
24. Major Incident Report (Rachelle Jackson) 8/7/200 RJ01058-RJ01059
25. Original Case Incident Report (missing person) RJ01066-RJ01067
26. General Progress Reports RJ00124-169
27. Clifton Sheppard Witness Accident Statement RJ00116-RJ00119
28. Traffic Crash Reprot RJ00120-RJ00169
29. Traffic Accident Supp Report RJ00170
30. Robbery Supp Report of Ronald Johnson RJ00171
31. Robbery Supp Report of Byron Arrest RJ00602-RJ00603
32. Crime Scene Processing Report, ET Photo of Lineup of RJ00174
33. Crime Scene Processing Report, gun recovery RJ00174
34. Crime Scene Processing Report, photos of Villanueva RJ00175
35. Crime Scene Processing Report, photos of Brogan RJ00176
36. Illinois State Police Records RJ00177-RJ00179
37. General Offense Case Report of Robbery RJ00180-RJ00181
38. Arrest Report of Byron Mangun 11/19/2002 - RJ00189
39. Arrest Report of Rachelle Jackson 11/19/2002 of RJ00634-RJ00635
40. Kevin Mangun ID Card RJ00200
41. Inventory Sheets RJ00201-RJ00206
42. Rachell Jackson Detective Division Hold sheet RJ00207
43. Sheriff Fax on Keon Mangun RJ00211-RJ00212
44. Detective Supp Report Part I RJ00214-RJ00225
45. Detective Supp Report Part II RJ00226-RJ00239
46. Detective Supp Report Part III RJ00240-RJ00250
47. Detective Supp Report (lineup report) RJ00251-RJ00256
48. Statement of Lance Wilson to ASA Brassil RJ00257-RJ00260
49. Statement of David Dillard to ASA Brassil RJ00261-RJ00265
50. Arrest Report of Pierre Mangun 11/19/2002 RJ0000636-RJ00637
51. OEMC Event Querrys (printed on 1/1/3/2004) RJ00282-RJ00329
52. Arrest Report of Baron Mangun 10/7/2002 RJ00638-RJ00639
53. Criminal Court File for Byron Mangun 02 CR30351 RJ00644-RJ00692
54. Criminal Court File for Pierre Mangun and Rachelle Jackson RJ00693-RJ00850
55. Chicago Fire Department Pre-Hospital Care Report of Brogan RJ00851-RJ00853

56. Chicago Fire Department Pre-Hospital Care Report ó Brown RJ00854-RJ00856
57. Chicago Fire Department Pre-Hospital Care Report ó Villaneuva RJ00857-RJ00859
58. Chicago Fire Department ó Fire Incident Report RJ00860-RJ00861
59. Chicago Fire Department Log Books RJ00862-RJ870
60. Officer Battery Report ó Villanueva RJ00885-RJ00886
61. Traffic Crash Supp Report RJ01036-RJ01044
62. Traffic Crash Supp Report RJ01045-RJ01049
63. Original Case Incident Report 8/7/2000 (Rachelle Jackson) RJ01056-RJ01057
64. Kelly Brogan's Medical Records RJ01068-RJ01088
65. Kelly Brogan's Medical Records RJ01105-RJ01235
66. Rachelle Jackson Missing Person Report RJ01273-RJ01274
67. Rachelle Jackson Mental Health Records RJ01441-RJ
68. Lisa Boughton's Records Boughton Dep.Gr.Ex.2 001-060.
69. Plaintiff's Response to Defendant City of Chicago First Set of Interrogatories
70. Plaintiff's Response to Defendant Brogan's First Set of Interrogatories
71. Plaintiff's Amended Response to Defendant Brogan's First Set of Interrogatories
72. Plaintiff's Response to Defendant McCormack's First Set of Interrogatories
73. Plaintiff's Response to Defendant's Request Admit
74. CPD Case Supp Reports P243-278
75. Byron Mangun's first oral statement to ASA Brassil P370
76. Byron Mangun's second oral statement to ASA Brassil P371
77. Kristen Villanueva Medical Records P417-444
78. Kelly Brogan's Medical Records P446-468
79. Rachelle Jackson Medical records from 2004 - P508-516
80. Haymarket Center Medical Records
81. Cermak Health Services Medical Records
82. Fantus Clinic Medical Records
83. Roseland Community Hospital Medical Records
84. John H. Stroger Cook County Hospital Medical Records
85. Haymarket Center Medical Records
86. Sally's Beauty Supply Records of Plaintiff
87. Pearl's Place Records of Plaintiff
88. Family Kitchen No Record Statement
89. Army & Lou's Records of Plaintiff
90. Cook County Jail Records of Plaintiff Rachelle Jackson
91. Life Change Institute for Women Records
92. Reports of James L. Cavanaugh
93. Reports of Orest Eugene Wasyliv
94. Report of Dr. Dragan Djordjevic
95. 911 Audio Tapes
96. Brogan's Pants from the incident

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Star 7350 and S. BARSCH,)	
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Defendants.)	

SCHEDULE C(iii) – EXHIBIT LISTS

PLAINTIFF'S OBJECTIONS TO DEFENDANTS' EXHIBIT LIST

- 13. Missing Persons Supp Case Report- Hearsay, foundation, relevance, unduly prejudicial, see motion in limine re alcohol
- 15. Statement of Eric Clifton to ASA Brassil, Hearsay, foundation
- 17. Rachelle Jackson's oral statement to ASA Brassil, Hearsay, foundation,

Marked for Identification

- 18-95. Plaintiff's have no objection to documents being marked and properly used for impeachment purposes only, subject to the ruling in this court. However if Defendants intent to admit any Impeachment Document ó plaintiff object Vague, Hearsay, foundation, relevance, 401/403.
- 96. Kelly Brogan's pants from the incident, not disclosed.

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Star 7350 and S. BARSCH,)	
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Defendants.)	

SCHEDULE C(iv) – EXHIBIT LISTS

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S EXHIBIT LIST

1. Pharmacy Tech License
Object: F.R.E. 401, 403 ó Relevance and subject to motion in limine.
2. Brogan and Juana Herrera cellular telephone records
Object: F.R.E. 401, 403, 602, 801, 802, 901 - Hearsay, Relevance, Foundation, Authentication and subject to motion in limine.
3. Brogan Cook County hospital Medical Records
Object: F.R.E. 602, 801, 802, 901 - Hearsay, Authentication
4. Employee Earnings and Social Security Records of Rachelle Jackson
Object: F.R.E. 401, 403, 602, 701, 801, 802, 901 and F.R.C.P. 26(a) - Hearsay, Relevance, Foundation, Authentication and subject to motion in limine
5. Traffic Specialist Hayes Report
Object: F.R.E. 801, 802 - Hearsay
6. 911 Tapes, Disk, and Transcripts (PCADØS)
Object: F.R.E. 401, 403, 602, 801, 802, 901 - Hearsay, Foundation, Authentication.
7. Arrest Reports
Object: unknown as to which Arrest Repots
8. Vice Case Report

Object: unknown as to which Vice Case Repots

9. EMT Reports

Object: unknown which reports, to the extent this includes EMT report on Officer Brogan F.R.E. 602, 801, 802, 901 - Hearsay, Foundation, Authentication and subject to motion in limine

10. Quest Lab Reports, Rachelle Jackson order by Dr. Dragon Djordjevic

Object: 401, 403, 602, 701, 801, 802, 901 - Hearsay, Relevance, Foundation, Authentication and subject to motion in limine

11. Scene Photos

12. Booking Photo of Rachelle Jackson

13. Accident Statements

Object: unknown which statements.

14. Line-Up Photos

15. Neurological Case Associates Medical Records

Object: F.R.E. 401, 403, 602, 701, 801, 802, 901 and F.R.C.P. 26(a) - Hearsay, Relevance, Foundation, Authentication and subject to motion in limine

16. Criminal History Report Rachelle Jackson

Object: 401, 403, 801, 802, - Hearsay, Relevance and subject to motion in limine

Impeachment Only

1. Witness Statements

2. Deposition Transcripts

3. Expert Reports

4. Grand Jury Transcripts

5. Criminal Trial Transcripts and Motion to Suppress Transcripts

6. All Detective Reports, Supplemental Reports, and GPRs

7. Brogan Physical Therapy Reports

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Star 7350 and S. BARSCH,)	
)	
Defendants.)	

SCHEDULE D(i) – WITNESS LISTS

PLAINTIFF'S WITNESS LIST

Plaintiff, Rachele Jackson, by her attorneys, Christopher R. Smith, and Daniel S. Alexander, respectfully submits the following witness list.

Witnesses preceded by * are witnesses the Plaintiff intends to call. All other listed witness may be called. Plaintiff reserve the right to object to any witnesses that were never disclosed as witnesses by Defendants, since defendants never disclosed the subjects on which said witnesses would testify and plaintiffs are not aware of the subjects of information possessed by such witnesses, beyond what is apparent from the documents produced in discovery.

1. *Rachele Jackson
2. * Patrick McCormack # 60045
3. * Michael O'Donnell #60029
4. * Kelly Brogan #10051
5. Officer Juana Herrera
6. Officer Michelle Sigg
7. Officer Kristen Villanvena #13483

8. *Traffic Specialist Jeanette Hayes
9. ASA John Brassil
10. *Eric Clifton
11. Byron Mangun
12. Pierre Mangun
13. *Clifton Sheppard
14. David Dillard
15. *EMT Jamie Heintz
16. *EMT Charles Graham
17. Melissa Stranes
18. *Arnold Wilson
19. *Charles Nevels
20. Kevin Mangun
21. 911 Center People: RE: Tapes, Transcripts, and Logs
22. *Delores Reynolds
23. 911 Caller: Coresha Morgan
24. 911 Caller: Helen McKee
25. 911 Caller: Lavonia Bell
26. *Richard Turner AKA James Turner
27. Jaikema Brooks
28. Marguaritte Long
29. Investigator Noel Zupansic
30. *Essie M. Govan
31. Luciel Askew
32. Erma Miller
33. *Marie Jackson
34. Thomusina Tatum
35. Officer: Kristen Villanueva #13483
36. *Officer Robert Vahl #7350
37. *Officer Steve Barsch #18287
38. Officer Daniel Gomez #19539
39. Lt. Ellyn Schmitz #354
40. Officer Alejandro DeLaCruz #18959
41. Officer Dorian Smith #19042
42. Officer Gonzalo Escobar #15824
43. Officer Jerome Hoffman #19110
44. Officer Marek Grobla #11686
45. *Detective David Evans #20927
46. Detective Joy VanBeveren #21219
47. T/S Theodore Ptak #4045
48. T/S Louis Torres #13888
49. T/S John McNamara #8693
50. E.T. Phillip Campbell #5673
51. Det. Chester Bach #20438
52. E.T Michael Parker #17802
53. E.T. Lawrence Fik #13570

54. E.T. Edward Perez # 5858
55. Officer Eural Black #12528
56. Officer Erik Johnson #11936
57. Officer Christopher Hoffman #13208
58. Officer Eugene Hoffmann #18463
59. Detective Albert Graf #20480
60. Detective Robert Trlak #20201
61. Detective James Sherlock #20212
62. Detective William C. Gehrke #20385
63. Detective Jean Romic #20333
64. Detective Daniel McInerny #20202
65. Officer Robert Shultz #13882
66. Detective Roger Murphy #20681
67. Denard Stewart
68. Kelly Brown
69. Christopher Piggott
70. Lance Wilson
71. Veronica Whitlow
72. Leslie Morgan
73. Diana Byrd
74. Ronald Johnson
75. William Barley
76. Frank Edwards
77. Howard Grimes
78. Officer Willie Lee Spears
79. David Evans
80. Crystal Carbellos
81. Dr. James Louis Cavanaugh
82. David Wadlington
83. Lisa Boughton
84. *Dr. Daniel Yohanna
85. Dr. Orest Eugene Wasyliv
86. *Dr. Dragan Djordjevic
87. Detective John Halloran #20453
88. Barry Corbin
89. Juan Hernandez
90. Dr. Smithgall, Cook County Hospital
91. RN: James Pandagert, Cook County Hospital
92. Personnel from Crime Lab, any person named in police reports, arrest reports, inventory sheets, medical reports, laboratory reports, Preliminary Hearing or Grand Jury transcripts, evidence reports, or any other document tendered to or available to the defense.
93. Any witness needed to establish the chain of custody for physical evidence sought to be introduced at trial.
94. Any witness on Defense witness list.

95. Records Keepers for various hospital records , Neurological Care Associates, 911 Center, and Social Security
96. Texas Women's Center Representative

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Defendants.)	

SCHEDULE D(ii) – WITNESS LISTS

DEFENDANTS' WITNESS LIST

Will Call:

1. Patrick McCormack, Defendant
2. Michael O'Donnell, Defendant
3. Robert Vahl, Defendant
4. Steven Barsch, Defendant
5. Kelly Brogan, Defendant
6. Eric Clifton
7. John Brassil
8. Dr. James L. Cavanaugh Jr.

May Call:

1. Rachelle Jackson
2. Kristin Villeneuve
3. Philip Campbell
4. P.O. Eugene Hoffman
5. P.O. Willie Spears
6. P.O. Juana Herrera
7. P.O. Robert Shultz Star 13882
8. Det. Roger Murphy Star 20681
9. P.O. Michael Kelly Star 16013
10. P.O. Douglas Szymansky Star 5028
11. T.S. Theodore Ptak Star 4045

12. T.S. Louis Torres Star 13888
13. P.O. Timothy Laurin Star 15916
14. P.O. Jonathan Washkevich Star 12022
15. Traffic Specialist Jeanette Hayes
16. Det. Stephen Terrell
17. Anthony Koziel
18. Daniel Sopcak
19. Jill Maderak
20. ET M. Parker
21. Lt Ellyn Schmitz
22. P.O. Daniel Gomez
23. P.O. Alejandro DeLaCruz
24. P.O Dorian Smith
25. P.O. Gonzalo Escobar
26. P.O. Jerome Hoffman
27. P.O. Marek Grobla
28. P.O. Jason Pawelczyk
29. P.O. Paul Greenan
30. Det. Daniel McInerny
31. Det. Robert Trylak
32. Det. James Sherlock
33. Det. William Gerhrke
34. Det. Chester Bach
35. Det. Albert Graf
36. Det. John Halloran
37. Charles Graham
38. Jaime Heintz
39. Lisa Boughton
40. Crystal Carabellos
41. Byron Mangun
42. Charles Nevels
43. James Turner
44. Melissa Starnes
45. Arnold Wilson
46. Veronica Whitlow
47. Pierre Magnum
48. Lace Wilson
49. David Dillard
50. Denard Stewart
51. Kelly Brown
52. Howard Grimes
53. Clifton Sheppard
54. Leslie Morgan
55. Diana J. Byrd
56. William Barley
57. David Evans

58. Daniel Gomez
59. Frank Edwards
60. Jern Berl
61. Barry Corbin
62. Ronald Johnson
63. Marie J. Johnson
64. David C. Wadlington
65. Dr. Orest Eugene Wasyliw
66. Dr. Routsung
67. Ann Marie Sullivan
68. Lisa Hennelly
69. Juan Hernandez
70. Lenorad Hale
71. Fred Craig
72. Margueitte Long
73. Lita White
74. Fatima Griggs
75. Lavonia Bell
76. Jerome Peterson
77. Melassie Starnes
78. Cokeshia Morgan
79. Michael Wells
80. Christopher Piggott
81. Kevin Mangon
82. Essie Govan
83. Lucille Askew
84. Erma Miller
85. Thomusina Tatum
86. Courtney Melendez
87. Investigator N.A. Zupancic
88. Dr. Paul Belich
89. Dr. Dragan Djordjevic
90. Dr. Remedios San Pedro Sales, M.D.
91. Record Keeper at Chicago Police Department
92. Record Keeper at Office of Emergency Management Communications
93. Record Keeper at Cermak Health Services
94. Record Keeper at Roseland Community Hospital
95. Record Keeper at Chicago Department of Pubic Health
96. Record Keeper at Haymarket Center
97. Record Keeper at Cook County Department of Corrections
98. Record Keeper at John H. Stroger Cook County Hospital
99. Record Keeper at Fantus Clinic
100. Record Keeper at Army & Louø Restaurant
101. Record Keeper at Pearlø Place
102. Record Keeper at Sallyø Beauty Supply
103. Record Keeper at Family Kitchen

104. Record Keeper at Life Change Institute for Women

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Defendants.)	

SCHEDULE D(iii) – WITNESS LISTS

PLAINTIFF'S OBJECTIONS TO DEFENDANTS' WITNESS LIST

Defendants Will Call List

1-8. No objections

Defendants May call list:

1. Rachelle Jackson - No objection
2. Kristin Vileneuve - No objection
- 3 E.T. Phillip Campbell #5673 – Objection relevance, hearsay, never disclosed
4. Officer Eugene Hoffmann #18463 - no objection
5. Officer Willie Lee Spears- no objection
6. Juana Herrera - No Objection
7. Officer Robert Shultz #13882 – Objection relevance, hearsay, never disclosed
8. Detective Roger Murphy #20681 ó Objection relevance, hearsay, never disclosed
9. P.O. Micheal Kelly ó Objection relevance, hearsay, never disclosed
10. P.O. Douglas Szymansky Star 5028 ó Objection relevance, hearsay, never disclosed
11. T/S Theodore Ptak #4045 – Objection relevance, hearsay, never disclosed
12. T/S Louis Torres #13888 ó Objection relevance, hearsay, never disclosed
13. P.O. Timothy Lauren Star 15916 ó Objection relevance, hearsay, never disclosed
14. P.O. Jonathan Washkevich star 12022 ó Objection relevance, hearsay, never disclosed
15. Traffic Specialist Jeanette - Hayes No objection
16. Detective Stephen Terrell ó Objection relevance, hearsay, never disclosed
17. Anthony Koziel ó Objection relevance, hearsay, never disclosed
18. Daniel Sopcak ó Objection relevance, hearsay, never disclosed

19. Jill Maderak ó Objection, hearsay, never disclosed
20. E.T Michael Parker #17802 ó Objection relevance, hearsay, never disclosed
21. Lt. Ellyn Schmitz #354 ó Objection relevance, hearsay, never disclosed
22. Officer Daniel Gomez #19539 ó Objection relevance, hearsay, never disclosed
23. Officer Alejandro DeLaCruz #18959 ó Objection relevance, hearsay, never disclosed
24. Officer Dorian Smith #19042 ó Objection relevance, hearsay, never disclosed
25. Officer Gonzalo Escobar #15824 ó Objection relevance, hearsay, never disclosed
26. Officer Jerome Hoffman #19110 ó Objection relevance, hearsay, never disclosed
27. Officer Marek Grobla #11686 ó Objection relevance, hearsay, never disclosed
28. Jason Pawelczyk ó Objection relevance, hearsay, never disclosed
29. P.O. Paul Greenan ó Objection relevance, hearsay, never disclosed
30. Detective Daniel McNerny #20202 ó Objection relevance, hearsay, never disclosed
31. Detective Robert Trlak #20201 ó Objection relevance, hearsay, never disclosed
32. Detective James Sherlock #20212 ó Objection relevance, hearsay, never disclosed
33. Detective William C. Gehrke #20385 ó Objection relevance, hearsay, never disclosed
34. Det. Chester Bach #20438 ó Objection relevance, hearsay, never disclosed
35. Detective Albert Graf #20480 ó Objection relevance, hearsay, never disclosed
36. Detective John Halloran #20453 ó Objection relevance, hearsay, never disclosed
37. Charles Graham - no objection
38. Jaime Heintz - no objection
39. Lisa Boughton - no objection
40. Crystal Carabellos - no Objection
41. Byron Mangun - no objection
42. Charles Nevels- no objection
43. James Turner - no objection
44. Melissa Starnes ó Objection relevance, hearsay, never disclosed
45. Arnold Wilson - no objection
46. Veronica Whitlow ó Objection relevance, hearsay, never disclosed
47. Pierre Mangun ó Objection relevance, hearsay, never disclosed
48. Lance Wilson ó Objection relevance, hearsay, never disclosed
49. David Dillard ó Objection relevance, hearsay, never disclosed
50. Denard Stewart ó Objection relevance, hearsay, never disclosed
51. Kelly Brown ó Objection relevance, hearsay, never disclosed
52. Howard Grimes ó Objection relevance, hearsay, never disclosed
53. Clifton Sheppard ó Objection relevance, hearsay, never disclosed
54. Leslie Morgan ó Objection relevance, hearsay, never disclosed
55. Diana Byrd ó Objection relevance, hearsay, never disclosed
56. William Barley ó Objection relevance, hearsay, never disclosed
57. David Evans - no objection
58. Daniel Gomez ó Objection relevance, hearsay, never disclosed
59. Frank Edwards ó Objection relevance, hearsay, never disclosed
60. Jern Berl ó Objection relevance, hearsay, never disclosed
61. Barry Corbin ó Objection relevance, hearsay, never disclosed
62. Ronald Johnson ó Objection relevance, hearsay, never disclosed
63. Marie Johnson - no objection
64. David Wadlington - no objection

65. Dr. Orest Eugene Wasyliv - no objection
66. Dr. Routsung ó Objection relevance, hearsay, never disclosed
67. Ann Marie Sullivan ó Objection relevance, hearsay, never disclosed
68. Lisa Hennelly ó Objection relevance, hearsay, never disclosed
69. Juan Hernandez ó Objection relevance, hearsay, never disclosed
70. Leonard Hale ó Objection relevance, hearsay, never disclosed
71. Fred Craig ó Objection relevance, hearsay, never disclosed
72. Marguaritte Long ó Objection relevance, hearsay, never disclosed
73. Lita White ó Objection relevance, hearsay, never disclosed
74. Fatima Griggs ó Objection relevance, hearsay, never disclosed
75. Lavonia Bell ó Objection relevance, hearsay, never disclosed
76. Jerome Peterson ó Objection relevance, hearsay, never disclosed
77. Melissa Stranes ó Objection relevance, hearsay, never disclosed
78. Cokeshia Morgan ó Objection relevance, hearsay, never disclosed
79. Michael Wells ó Objection relevance, hearsay, never disclosed
80. Christopher Piggott ó Objection relevance, hearsay, never disclosed
81. Kevin Mangun ó Objection relevance, hearsay, never disclosed
82. Essie Govan - no objection
83. Lucille Askew - no objection
84. Erma Miller - no objection
85. Tomusina Tatum - no objection
86. Courtney Melendez ó Objection relevance, hearsay, never disclosed
87. Investigator Noel Zupansic ó Objection relevance, hearsay, never disclosed
88. Dr. Paul Belich ó Objection relevance, hearsay, never disclosed
89. Dr. Dragon Djordjevic - no objection
90. Dr. Remedios San Pedro Sales, M.D. ó Objection relevance, hearsay, never disclosed
- 91-104. Plaintiffø has no objections to record keepers for admissible evidence however
see Objections to Defendantø Exhibit List

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RACHELLE JACKSON,)	
)	
Plaintiff,)	
)	
v.)	No. 03 C 8289
)	
CITY OF CHICAGO, and POLICE OFFICERS)	Judge Ruben Castillo
PATRICK MCCORMACK, Star 60045,)	
MICHEAL O'DONNELL, Star 60029,)	
KELLY BROGAN, Star 10051, R. VAHL,)	
Star 7350 and S. BARSCH,)	
)	
Defendants.)	

SCHEDULE D(iv) – WITNESS LISTS

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S WITNESS LIST

Defendants' Agreed and Disputed Witnesses:

Agreed Witnesses

- 1) Rachelle Jackson
- 2) Patrick McCormack
- 3) Michael O'Donnell
- 4) Kelly Brogan
- 5) Eric Clifton
- 6) EMT Charles Graham
- 7) EMT Jamie Heintz
- 8) Traffic Specialist Jeanatte Hayes
- 9) Clifton Sheppard
- 10) Arnold Wilson
- 11) Charles Nevels

- 12) Marie Jackson
- 13) Officer Robert Vahl
- 14) Officer Barsch
- 15) Detective David Evans
- 16) Dr. Daniel Yohanna
- 17) Dr. Dragan Djordjevic
- 18) Dr. James Cavanaugh
- 19) ASA John Brassill
- 20) Kristin Villanueva
- 21) Juana Herrerra
- 22) Michelle Sigg
- 23) Byron Mangun
- 24) Pierre Mangun
- 25) Investigator Zupansic
- 26) Det. Albert Graf
- 27) Det. James Sherlock
- 28) Det. William Gehrke
- 29) Det. Daniel McNerny
- 30) Denard Stewart -
- 31) Kelly Brown
- 32) Christopher Piggott
- 33) Lance Wilson
- 34) Veronica Whitlow
- 35) Leslie Morgan
- 36) Diana Byrd

- 37) Ronald Johnson
- 38) William Barley
- 39) Howard Grimes
- 40) PO Willie Spears
- 41) David Evans
- 42) Crystal Carbellos
- 43) Dr. David Wadlington
- 44) Lisa Boughton
- 45) Dr. Eugene Wasyliw
- 46) PO Eugene Hoffman
- 47) David Dillard
- 48) Melissa Starnes
- 49) PO Eugene Hoffman

Disputed Witnesses

Defendants' Objections:

- 1) Kevin Mangun ó **relevance**
- 2) Dolores Reynolds - **Relevance and Cumulative**
- 3) Richard James Turner ó **relevance**
- 4) Essie M. Govan - **Relevance and Cumulative**
- 5) 911 Caller Coresha Morgan ó **relevance and cumulative**
- 6) 911 Caller Helen McKee - **relevance and cumulative**
- 7) 911 Caller Lavonia Bell - **relevance and cumulative**
- 8) Margueritte Long ó **relevance**
- 9) Lucille Asker - **Relevance and Cumulative**
- 10) Erma Miller - **Relevance and Cumulative**

- 11) Thomusina Tatum ó **Relevance and Cumulative**
- 12) Officer Daniel Gomez - **Relevance and Cumulative**
- 13) Lt. Ellyn Schmitz - **Relevance and Cumulative**
- 14) PO Alejandro DelaCruz - **Relevance and Cumulative**
- 15) PO Dorian Smith - **Relevance and Cumulative**
- 16) PO Gonzalo Escobar - **Relevance and Cumulative**
- 17) PO Jerome Hoffman - **Relevance and Cumulative**
- 18) PO Marek Grobla - **Relevance and Cumulative**
- 19) Det. Chester Bach - **Relevance and Cumulative**
- 20) T.S. Theodore Ptak - **Relevance and Cumulative**
- 21) TS Louis Torress - **Relevance and Cumulative**
- 22) EMT Phillip Campbell - **Relevance and Cumulative**
- 23) ET Michael Parker - **Relevance and Cumulative**
- 24) PO Jerome Hoffman - **Relevance and Cumulative**
- 25) PO Robert Shultz - **Relevance and Cumulative**
- 26) PO Roger Murphy - **Relevance and Cumulative**
- 27) Det. John Halloran - **Relevance and Cumulative**
- 28) Barry Corbin - **Relevance and Cumulative**
- 29) Juan Hernandez - **Relevance and Cumulative**
- 30) 911 Center People ó **Unknown and improper disclosure**
- 31) Jaikema Brooks ó **relevance**
- 32) Det. Joy Vanbeveren - **Relevance and Cumulative**
- 33) PO Eurel Black ó **Relevance and Cumulative**
- 34) PO Erick Johnson - **Relevance and Cumulative**
- 35) TS John Mcnamara - **Relevance and Cumulative**

- 36) ET Lawrence Fik - **Relevance and Cumulative**
- 37) ET Edward Perez - **Relevance and Cumulative**
- 38) PO Christopher Hoffman - **Relevance and Cumulative**
- 39) Det. Robert Trlak - **Relevance and Cumulative**
- 40) Det. Jean Romic - **Relevance and Cumulative**
- 41) Dr. Smithgall, Cook County Hospital ó **relevance, cumulative and 26(a)(2)**
- 42) RN James Panagert Cook County Hospital - **relevance, cumulative and 26(a)(2)**
- 43) Personnel from Crime Lab, any person named in police reports, arrest reports, inventory sheets, medical reports, laboratory reports, Preliminary Hearing or Grand Jury transcripts, evidence reports, or any other document tendered to or available to the defense. ó **Relevance, Unknown and improper disclosure**
- 44) Any witness needed to establish the chain of custody for physical evidence sought to be introduced at trial. - **Relevance, Unknown and improper disclosure**
- 45) Records Keepers for various hospital records , Neurological Care Associates, 911 Center, and Social Security - **Relevance, Unknown, improper disclosure and subject to motion in limine**
- 46) Texas Women's Center Representative ó **Relevance, Unknown and improper disclosure, and 26(a)(2)**

Defendants' May Call witness that plaintiff has not identified.

- 105. Dr. Remedios San Pedro Sales, M.D.
- 106. Record Keeper at Chicago Police Department
- 107. Record Keeper at Office of Emergency Management Communications
- 108. Record Keeper at Cermak Health Services
- 109. Record Keeper at Roseland Community Hospital
- 110. Record Keeper at Chicago Department of Public Health
- 111. Record Keeper at Haymarket Center
- 112. Record Keeper at Cook County Department of Corrections
- 113. Record Keeper at John H. Stroger Cook County Hospital
- 114. Record Keeper at Fantus Clinic
- 115. Record Keeper at Army & Lou's Restaurant
- 116. Record Keeper at Pearl's Place
- 117. Record Keeper at Sally's Beauty Supply
- 118. Record Keeper at Family Kitchen
- 119. Record Keeper at Life Change Institute for Women

- 120. Courtney Melendez
- 121. Dr. Paul Belich

/s Christopher R. Smith

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